

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.    <u>05-530</u></b>
	<b>:</b>	
<b>v.</b>	<b>:</b>	<b>DATE FILED        _____</b>
	<b>:</b>	
<b>STANLEY SKEETERS</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1951 (conspiracy to interfere</b>
	<b>:</b>	<b>with interstate commerce by robbery - 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 1951 (interference with</b>
	<b>:</b>	<b>interstate commerce by robbery - 4</b>
	<b>:</b>	<b>counts)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c)(1) (possessing a</b>
	<b>:</b>	<b>firearm during and in relation to a crime</b>
	<b>:</b>	<b>of violence - 4 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

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**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. The following businesses were engaged in interstate commerce:
  - a. Stacy's Pizza, located at 4201 Market Street in Philadelphia,  
Pennsylvania.
  - b. S&M Grocery, located at 33 South 40th Street in Philadelphia,  
Pennsylvania.
  - c. Ted's Pizza, located at 3741 Lancaster Avenue in Philadelphia,  
Pennsylvania.
  - d. Tic Toc Pizza, located at 4026 Market Street in Philadelphia,  
Pennsylvania.

## **THE ROBBERY CONSPIRACY**

2. From on or about October 5, 2004, to on or about December 16, 2004, in the Eastern District of Pennsylvania, defendant

### **STANLEY SKEETERS**

conspired and agreed, together and with others known and unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, in that defendant STANLEY SKEETERS and a person known to the grand jury, conspired to unlawfully take and obtain personal property, including money, Southeastern Pennsylvania Transportation Authority (SEPTA) tokens, phone cards, cigars, keys, and telephones, from the person and in the presence of others and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

### **MANNER AND MEANS**

3. It was part of this conspiracy that defendant STANLEY SKEETERS and others known and unknown to the United States:

- a. drove together in a vehicle or walked to the businesses listed in paragraph 1 (the businesses) armed with weapons, including a semiautomatic pistol and a sawed-off shotgun;
- b. entered the businesses pointing guns;
- c. threatened and intimidated the employees and patrons inside the

businesses; tied up and restrained some employees with shoelaces, tape, and apron strings; took possession of cellular telephones and telephone handsets; and removed telephones to prevent their victims from calling the police or otherwise calling for help;

- d. stole merchandise, cash, and personal property from the employees; and,
- e. fled from the businesses in a vehicle or on foot and divided the stolen merchandise, cash, and other property among themselves.

### **OVERT ACTS**

In furtherance of this conspiracy, in Philadelphia, in the Eastern District of Pennsylvania, defendant STANLEY SKEETERS and others committed the following overt acts:

#### **Stacy's Pizza**

1. On or about October 5, 2004, defendant STANLEY SKEETERS and a person known to the grand jury:

- a. drove together to Stacy's Pizza located at 4201 Market Street in Philadelphia, Pennsylvania;
- b. entered the store carrying a semiautomatic pistol and a sawed-off shotgun, displayed the weapons to the employees, and demanded money; and,
- c. stole cash from the store's cash register and fled.

#### **S&M Grocery**

2. On or about December 13, 2004, defendant STANLEY SKEETERS and a person known to the grand jury:

- a. walked together to S&M Grocery located at 33 South 40th Street in Philadelphia, Pennsylvania;

- b. entered the store carrying a sawed-off shotgun, displayed the weapon to the employee, and demanded money;
- c. threw pepper into the eyes of the employee;
- d. forced the employee onto the floor and tied the employee's wrists and ankles with shoelaces; and,
- e. stole cash from the store's cash register and other items of value from the store, including the store telephone, and fled.

#### **Ted's Pizza**

- 3. On or about December 15, 2004, defendant STANLEY SKEETERS and a person known to the grand jury:
  - a. drove together to Ted's Pizza located at 3741 Lancaster Avenue in Philadelphia, Pennsylvania;
  - b. entered the store carrying a sawed-off shotgun, displayed the weapon to the employees, and demanded money; and,
  - c. stole cash from the store's cash register and the telephone handset from the store, and fled.

#### **Tic Toc Pizza**

- 4. On or about December 16, 2004, defendant STANLEY SKEETERS and a person known to the grand jury:
  - a. walked together to Tic Toc Pizza located at 4026 Market Street in Philadelphia, Pennsylvania;
  - b. entered the store carrying a sawed-off shotgun, displayed the weapon to

the employees, and demanded money;

c. forced the employees onto the floor and tied the employees's wrists and ankles with tape and apron strings; and,

d. stole cash from the store's cash register, cash and a cellular telephone from the store's owner, a watch, cash register keys, keys to the delivery truck, the telephone handset from the store, and the store's surveillance video tape, and then fled.

All in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.a and 3 of Count One are incorporated here.
2. On or about October 5, 2004, in Philadelphia, in the Eastern District of

Pennsylvania, defendant

**STANLEY SKEETERS,**

and a person known to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SKEETERS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, money, from the person or in the presence of employees of Stacy's Pizza, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, by brandishing firearms, pointing a firearm at one of the employees, and demanding money.

In violation of Title 18, United States Code, Sections 1951, 1951(b)(1), and 1951(b)(3), and 2(a).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 5, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**STANLEY SKEETERS,**

and a person known to the grand jury, knowingly carried, and aided and abetted the carrying of, a firearm, that is, a loaded handgun and a short-barreled shotgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.b and 3 of Count One are incorporated here.
2. On or about December 13, 2004, in Philadelphia, in the Eastern District of

Pennsylvania, defendant

**STANLEY SKEETERS**

and a person known to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SKEETERS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, money, cigarettes, SEPTA tokens, blunt cigars, and prepaid phone cards in the presence of an employee of S&M Grocery, and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person and property, by brandishing a firearm, throwing pepper in the face of the employee, demanding money, and tying up the employee.

In violation of Title 18, United States Code, Sections 1951, 1951(b)(1), and 1951(b)(3), and 2(a).



**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 13, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**STANLEY SKEETERS**

and a person known to the grand jury, knowingly carried, and aided and abetted the carrying of, a firearm, that is, a short-barreled shotgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.c and 3 of Count One are incorporated here.
2. On or about December 15, 2004, in Philadelphia, in the Eastern District of

Pennsylvania, defendant

**STANLEY SKEETERS,**

and a person known to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SKEETERS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, money and a telephone handset, from the person of and in the presence of employees of Ted's Pizza, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, by brandishing a firearm and demanding money.

In violation of Title 18, United States Code, Sections 1951, 1951(b)(1), and 1951(b)(3), and 2(a).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 15, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**STANLEY SKEETERS**

and a person known to the grand jury, knowingly carried, and aided and abetted the carrying of, a firearm, that is, a short-barreled shotgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

## **COUNT EIGHT**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.d and 3 of Count One are incorporated here.
2. On or about December 16, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

### **STANLEY SKEETERS**

and a person known to the grand jury, obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SKEETERS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, money, a watch, telephones, keys, and the store's surveillance video tape, from the person of employees of Tic Toc Pizza, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, by brandishing firearms, demanding money, and tying up employees.

In violation of Title 18, United States Code, Sections 1951, 1951(b)(1), and 1951(b)(3), and 2(a).

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 16, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**STANLEY SKEETERS**

and a person known to the grand jury, knowingly carried, and aided and abetted the carrying of, a firearm, that is, a short-barreled shotgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**